Karen & Bud Yager
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Waitsburg WA 99361
April 9, 2002

Allen Fiksdal, Manager
Energy Facility Site Evaluation Council
PO Box 43172
Olympia, WA 98504-3172

To Whom It May Concern:

Re: Wallula Power Project

We are strongly opposed to implementing the Wallula Gas Power Project for the following reasons:

1. **The plant will release emissions of PM10 in a PM10 nonattainment area.** Combined with the emissions from the other fossil fuel plants operating, under construction, and proposed for upwind of our basin, the 1300-megawatt gas-fired power plant to be constructed in western Walla Walla County will add to an already hazardous[1] pollution problem. 24-1
2. **The plant will emit toxic air pollutants in excess of Washington's "small quantity emission rates"**: 1,3-Butadiene; Acetaldehyde; Benzene; Formaldehyde; Benzo(a)pyrene; and Propylene Oxide. The emissions of these carcinogens are reported to be in concentrations "less than acceptable source impact levels." When our valley has a temperature inversion, the pollutants may make our smog even more dangerous to our health. 24-2
3. **The plant will emit approximately 6.9 million gallons of water vapor per day to the atmosphere.** The DEIS addresses steam plume visibility, summer fogging, icing and other factors. However, it does not adequately address a common situation in the Pasco Basin and Walla Walla Valley: winter fog. When we have high relative humidity in the winter, the turbines' emissions may increase the occurrence of fog, which could cause more flight cancellations, highway accidents, and increase seasonal affective disorder. 24-3

[1] In the current issue of the Journal of the American Medical Association is an article about a 20-year study correlating "normal" air pollution with adverse health effects. "Normal" air pollution increases the incidence of heart and lung disease by 13 to 20%. We live in a nonattainment area for particulates, which suggests that our air pollution is already worse than "normal."

4. **The plant will contribute to greenhouse gases.** The total annual emissions of carbon dioxide, nitrous oxide, and other greenhouse gases resulting from the combustion of natural gas, plus fugitive leaks of natural gas (mostly methane) from the pipeline, "would be 4.8% of the greenhouse gas emitted from all sources in Washington State and 9.6% of the amount anticipated to be issued from all proposed future power plants in the Northwest." Scientists agree that burning fossil fuels increases temperature, storminess, and the sea level, as well as having an impact on all wildlife. 24-4
5. **The plant will generate power for California and other states**—not eastern Washington and Oregon who do not need the power—although we will pay for the power generation with increased health risks. 24-5

As downwinders of the proposed project, we know that this plan will be detrimental to our health and to our agriculture. We ask that you withdraw your consideration to implement the Wallula Power Project, and we urge you to focus on developing renewable energy projects that add positively to our environment, our health, and our children's well-being. 24-6

Sincerely,

Karen Yager Bud Yager

KAREN & BUD YAGER

Responses to Comment Submission 24,
Letter from Karen and Bud Yager, Waitsburg, WA,

24-1. As described in Section 3.2 of the EIS, the applicant is required to install Lowest Achievable Emission Rate (LAER) emission controls, then they are required to offset at least 100% of the project's PM10 emissions. This requirement ensures that new facilities constructed in the nonattainment area will not cause further degradation of PM10 air quality within the nonattainment area.

24-2. The applicant modeled the worst-case toxic air pollutant concentrations by using the ISCST3 computer model with meteorological data from Wallula. Therefore, the modeled worst-case impacts account for wintertime conditions.

24-3. The water vapor emissions from the power plant would be less than 5% of the naturally occurring water vapor that blows past the plant site on winter days and far less than 1% of the water vapor in the region. Therefore, it is unlikely the plant would exacerbate wintertime fog conditions.

24-4. Section 3.17 has been updated to describe the applicant's recent proposal for greenhouse gas mitigation. Please see Chapter 3 of this Final EIS. Greenhouse gas emissions will still be significant for this project.

24-5. The power plant will be operated as a merchant plant, selling power to the open market. Some of the power may go to California. Demand for power in the Pacific Northwest has also been growing.

24-6. Bonneville is involved in developing renewable energy projects throughout the Pacific Northwest, including 500 to 1,000 megawatts of wind generation in the next two years and 50 megawatts of geothermal generation. Other utilities are pursuing development of renewables through programs that allow customers to choose "green energy" as an option for their electric service. Diversity of power generation sources is important in maintaining a stable and reliable power supply for the next generation.